

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHINESE AUTOMOBILE DISTRIBUTORS  
OF AMERICA, LLC  
Plaintiff,

07 Civ. 4113 (LLS)

v.  
MALCOLM BRICKLIN, ET.AL.,  
Defendants

-----X  
**MOTION TO ADMIT COUNSEL**  
**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: JAN MICHAEL MORRIS, ESQ.  
Firm Name: LAW OFFICES OF JAN MICHAEL MORRIS, PA  
Address: PO BOX 276153  
City/State/Zip: BOCA RATON, FL 33427  
Phone Number: 561-395-4195  
Fax Number: 561-338-8698

FILED  
U.S. DISTRICT COURT  
2007 NOV 16 PM 2:42  
S.D. OF N.Y.

is a member in good standing of the Bar of the State of Florida, and the General Bar of the United States District Court for the Southern District of Florida. There are no pending disciplinary proceedings against Jan Michael Morris, Esq. in any State or Federal court.

Dated: November 6, 2007  
New York, New York

Respectfully submitted,

By: 

Sponsor's Name: Charles T. Lee, Esq.  
Sponsor's SDNY Bar: CL 5934  
Firm Name: McCarter and English, LLP  
245 Park Ave.  
New York, New York, 10167  
212-609-6800

By: 

Jan Michael Morris, Esq.

\* See Attached

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHINESE AUTOMOBILE DISTRIBUTORS  
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Defendants  
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**DECLARATION OF  
SPONSORING ATTORNEY  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL PRO HAC VICE**

State of New York    )  
                              ) **SS:**  
County of New York )

Charles T. Lee , being duly sworn, hereby deposes and says as follows:

1. I am a member of the bar of this Court and of the law firm of McCarter & English, LLP, attorneys for the Plaintiff. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in reliance on facts provided to me and in support of Defendants' motion to admit **Jan Michael Morris, Esq.** as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on April 11, 1977. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known **Jan Michael Morris, Esq.** since October 31, 2007.
4. Jan Michael Morris, Esq. is a member in the firm of the Law Offices of Jan Michael Morris, Esq.
5. I have found Jan Michael Morris, Esq. to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of **Jan Michael Morris, Esq.** , pro hac

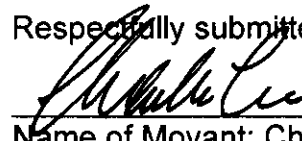
vice.

7. I respectfully submit a proposed order granting the admission of **Jan Michael Morris, Esq.** , pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit **Jan Michael Morris, Esq.** , pro hac vice, to represent Defendants in the above captioned matter, be granted.

Dated: November 6, 2007  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles T. Lee", is written over a horizontal line.

Name of Movant: Charles T. Lee, Esq  
SDNY Bar Code: CL 5934  
245 Park Ave.  
New York, New York, 10167  
212-609-6800



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 651291  
Jan Michael Morris  
Law Offices of Jan Michael Morris  
P.O. Box 276153  
Boca Raton, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on May 14, 1987.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 7th day of November, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is written in a cursive, flowing style.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/ssW1:R10

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHINESE AUTOMOBILE DISTRIBUTORS  
OF AMERICA, LLC  
Plaintiff,

**07 Civ. 4113 (LLS)**

v.  
MALCOLM BRICKLIN, ET.AL.,  
Defendants

\_\_\_\_\_  
**ORDER FOR ADMISSION**  
**PRO HAC VICE**  
**ON WRITTEN MOTION**

Upon the motion of attorney for Charles T. Lee, Esq. (Sponsor) and said sponsor attorney's declaration in support;

**IT IS HEREBY ORDERED** that JAN MICHAEL MORRIS, ESQ.:  
Firm Name: LAW OFFICES OF JAN MICHAEL MORRIS, PA  
Address: PO BOX 276153  
City/State/Zip: BOCA RATON, FL 33427  
Telephone/Fax: 561-395-4195/561-338-8698  
Email Address: jan@themorrislawoffice.com

is admitted to practice pro hac vice as counsel for the Defendants, Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

\_\_\_\_\_  
United States District/Magistrate Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a bona fide effort has been or will be made to resolve or minimize the issues and a true and correct copy of the Motion to Appear Pro Hac Vice was faxed/mailed/emailed this 13 day of NOV, 2007 to: Charles Lee, Esq 245 Park Ave. New York, New York, 10167, Stephen Jacobs, Esq., Attorney for Defendant Scott Gildea 120 Broadway, 27<sup>th</sup> Floor, New York, NY 10271, Richard Scarola, Esq, Former Attorney for Defendants, Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC 688 Seventh Ave. 45<sup>th</sup> Floor, New York, NY 10106

Respectfully submitted,  
JAN MICHAEL MORRIS, ESQUIRE  
LAW OFFICES OF JAN MICHAEL MORRIS, PA  
P.O. Box 276153  
Boca Raton, Florida 33427  
(561) 395-4195  
Email: [jan@themorrislawoffice.com](mailto:jan@themorrislawoffice.com)

BY: 

JAN MICHAEL MORRIS

Fla. Bar No: 651291

Attorney for Defendants:

Malcolm Bricklin, Jonathan Bricklin,  
Barbara Bricklin Jonas, Michael Jonas,  
Sania Teymeny and Visionary Vehicles, LLC

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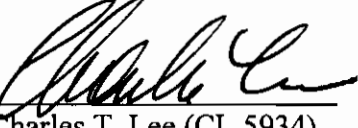
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the annexed November 6, 2007 Declaration of, Charles T. Lee Esq., the exhibit attached hereto, Defendants Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC, will move this Court without hearing, before the Honorable Louis L. Stanton, United States District Judge, at the United States Courthouse, 900 Pearl St., NY, NY 10007, for an Order admitting Jan Michael Morris, Esq. to appear Pro Hac Vice and granting such other relief as the Court deems proper.

Dated: New York, New York  
November, 2007

Respectfully Submitted,  
McCarter & English, LLP

By:   
Charles T. Lee (CL 5934)  
*Attorneys for Plaintiff*  
245 Park Ave.  
New York, New York, 10167  
212-609-6800

**UNITED STATES DISTRICT COURT  
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Defendants

-----X

**DECLARATION**

Charles Lee, Esq, hereby declares the truth of the following, under penalty of perjury, pursuant to 28 USC 1746:

1. I am an attorney, duly admitted to practice law before this Court. I am a member of the law firm of McCarter and English, LLP, attorney for the Plaintiff named below, and as such, I am familiar with the facts and circumstances of this case. This Declaration is submitted in support of Jan Michael Morris, Esq.'s Motion to Appear Pro Hac Vice, and any such other relief the Court deems proper.

2. Attached is a true and correct copy of Jan Michael Morris, Esq.'s Motion to Appear Pro Hac Vice, Declaration in Support thereof, and proposed Order admitting Jan Michael Morris, Esq. to appear Pro Hac Vice and granting such other relief as the Court deems proper.

Dated: New York, New York  
November 6, 2007

Respectfully Submitted,  
McCarter and English, LLP

By: 

Charles T. Lee, Esq (CL 5934)  
*Attorneys for Plaintiff*  
245 Park Ave.  
New York, New York, 10167  
212-609-6800



CC: Stephen Jacobs, Esq.  
120 Broadway, 27<sup>th</sup> Floor  
New York, NY 10271  
Attorney for Defendant Scott Gildea

Richard Scarola, Esq  
888 Seventh Ave. 45<sup>th</sup> Floor  
New York, NY 10106  
Former Attorney for Defendants  
Malcolm Bricklin, Jonathan Bricklin,  
Barbara Bricklin Jonas, Michael Jonas,  
Sania Teymeny and Visionary Vehicles, LLC